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22 Attorneys for Defendants,
23 JOHN EARL REDFERN, J. REDFERN, INC.,
24 dba GOLDEN STATE LANDSCAPING; JLS
25 PARTNERS, INC., dba GSL CONSTRUCTION,
26 EMPIRE LANDSCAPE CONSTRUCTION

27 UNITED STATES DISTRICT COURT
28 NORTHERN DISTRICT OF CALIFORNIA
29 SAN FRANCISCO DIVISION

30 MARCOS VARGAS, ROMUALDO
31 ALTAMIRANO, PEDRO RAMOS,
32 BULMARO BAZAN, MARCOS
33 MANDUJANO, JOSE: SOLIS, LUIS
34 PENA, BENITO CHAIREZ, FIGUEROA,
35 FREDY ROCHA, SALVADOR FLORES,
36 ISMAEL CORONA, EPIGMENIO
37 LOPEZ, JUAN CORONA, ENRIQUE
38 TAMAYO, FRANCISCO SALGADO,
39 SILVERIO TORRES, MARTIN RAMOS
40 RAMIREZ, ANGEL SANCHEZ, ERON
41 LOPEZ, EDUARDO VARGAS, JORGE
42 SOTO, RIGOBERTO SANCHEZ:, JULIO
43 LOPEZ, JOSE J. GARCIA, PEDRO
44 SIERRA, DAMACIO SANCHEZ, JUAN
45 GUERRA, JAIME MARTINEZ JR.,
46 ROBERT MONTOYA, MATEO
47 GUZMAN, LAZARO MAYA, JOSE

48 Case No. C-12-04052-CRB

49 **JOINT STIPULATION AND ORDER
50 REGARDING RESPONSIVE PLEADING
51 TO THE COMPLAINT PURSUANT TO
52 LOCAL RULE 6-1**

53 JOINT STIP. AND [PROPOSED] ORDER
54 REGARDING RESPONSE TO COMPLAINT

1 ESTRADA, ANICETO ALMANZA
2 SANCHEZ, EMILIO VARGAS, JOSE
3 ANTONIO ALVAREZ, ANTONIO
4 RODRIGUEZ, JOSEPH RENEE
5 RODRIGUEZ, MAURICIO SANCHEZ,
6 MAURICIO SANCHEZ ARZATE,
7 MANUEL RENTERIA, MIGUEL
8 SUCHIL MENDOZA, and VICENTE
9 MARTINEZ, individually and on behalf of
10 all others similarly situated,
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12 Plaintiffs,

13 v.
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15 JOHN EARL REDFERN, an individual;
16 J. REDFERN, INC., (dba "GOLDEN
17 STATE LANDSCAPING"), a California
18 Corporation; JLS PARTNERS, INC.,
19 (dba "GSL CONSTRUCTION"), a
20 California Corporation; and EMPIRE
21 LANDSCAPE CONSTRUCTION, a
22 California Corporation,
23
24 Defendants.

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26 Plaintiffs Marcos Vargas, Romualdo Altamirano, Pedro Ramos, Bulmaro Bazan, Marcos
27 Mandujano, Jose Solis, Luis Pena, Benito Chairez, Figueroa, Fredy Rocha, Salvador Flores, Ismael
28 Corona, Epigmenio Lopez, Juan Corona, Enrique Tamayo, Francisco Salgado, Silverio Torres,
1 Martin Ramos Ramirez, Angel Sanchez, Eron Lopez, Eduardo Vargas, Jorge Soto, Rigoberto
2 Sanchez, Julio Lopez, Jose J. Garcia, Pedro Sierra, Damacio Sanchez, Juan Guerra, Jaime Martinez
3 Jr., Robert Montoya, Mateo Guzman, Lazaro Maya, Jose Estrada, Aniceto Almanza Sanchez, Emilio
4 Vargas, Jose Antonio Alvarez, Antonio Rodriguez, Joseph Renee Rodriguez, Mauricio Sanchez,
5 Mauricio Sanchez Arzate, Manuel Renteria, Miguel Suchil Mendoza, and Vicente Martinez,
6 (collectively "Plaintiffs") and Defendants John Earl Redfern, J. Redfern, Inc. (dba Golden State
7 Landscaping), JLS Partners, Inc. (dba GSL Construction), and Empire Landscape Construction
8 (collectively "Defendants") agree and stipulate, through their respective counsel, to the following
9 extension:

10 1. The parties have finalized and signed their settlement agreement.

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13 JOINT STIP. AND [PROPOSED] ORDER
14 REGARDING RESPONSE TO COMPLAINT
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1 2. The state court has set November 14, 2013 as the hearing date for the motion for
2 approval of the related state court class settlement.

3 4. The settlement of the Plaintiffs' claims in this matter will be contingent upon state
4 court approval of the class settlement.

5 5. The parties have agreed to continue the deadline for Defendants' responsive pleading
6 to Plaintiff's complaint from October 16, 2013 until January 16, 2014, in order to ensure that the
7 state court settlement is approved before this matter is dismissed.

8 6. The parties also request that the initial Case Management Conference, which is
9 scheduled for November 8, 2013, be postponed to February 7, 2014.

10 THEREFORE, the parties hereby stipulate and request that this Court order the following:

11 1. The deadline for Defendants to file their responsive pleading to Plaintiffs' complaint
12 is set for January 16, 2014.

13 2. The Case Management Conference be scheduled for February 7, 2014 or to a date
14 convenient for the Court.

1 Dated: October 16, 2013

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/s/ Stan Mallison

MARCO A. PALAU
LAW OFFICES OF MALLISON &
MARTINEZ
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ALTAMIRANO, PEDRO RAMOS,
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ROCHA, SALVADOR FLORES, ISMAEL
CORONA, EPIGMENIO LOPEZ, JUAN
CORONA, ENRIQUE TAMAYO,
FRANCISCO SALGADO, SILVERIO
TORRES, MARTIN RAMOS RAMIREZ,
ANGEL SANCHEZ, ERON LOPEZ,
EDUARDO VARGAS, JORGE SOTO,
RIGOBERTO SANCHEZ:, JULIO LOPEZ,
JOSE J. GARCIA, PEDRO SIERRA,
DAMACIO SANCHEZ, JUAN GUERRA,
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JOSE ANTONIO ALVAREZ, ANTONIO
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RODRIGUEZ, MAURICIO SANCHEZ,
MAURICIO SANCHEZ ARZATE, MANUEL
RENTERIA, MIGUEL SUCHIL MENDOZA,
and VICENTE MARTINEZ

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Dated: October 16, 2013

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/s/ Marlene S. Muraco

MARLENE S. MURACO
LITTLER MENDELSON
A Professional Corporation
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JOHN EARL REDFERN, J. REDFERN, INC.,
dba GOLDEN STATE LANDSCAPING; JLS
PARTNERS, INC., dba GSL
CONSTRUCTION, EMPIRE LANDSCAPE
CONSTRUCTION

1 IT IS SO ORDERED:
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4 Dated: October 21, 2013
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6 Firmwide:123680460.1 059436.1001
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